

27

INVESTIGATIVE REPORT  
A. LAHAR'S MAPLE RIDGE FARM

LOCATION: A. Lahar's Maple Ridge Farm Sugarhouse  
Town Highway 11  
Albany, VT  
(see Attachment I)

MAILING ADDRESS: RFD, Irasburg, VT 05845

PHONE: (802) 755-6700

INTRODUCTION:

On March 19, 1985, a preliminary investigation was conducted as a result of a referral from the Department of Agriculture. The investigation was to determine the contents of various tanks and drums located at the Lahar's Maple Ridge Farm sugarhouse. The tanks and drums were initially discovered by Richard Jensen, a Department of Agriculture investigator, on June 8, 1984, during routine general surveillance of the area. Mr. Jensen revisited the site on November 8, 1984, to confirm his initial findings. On March 15, 1985, Mr. Jensen contacted the Agency of Environmental Conservation's Hazardous Materials Management Program with the information of possible bulk waste oil storage at Lahar's Maple Ridge Farm (Attachment II).

In addition, a complaint had been received by the HMMP (Attachment III) on December 21, 1984, concerning the improper disposal of waste transformer oils through a maple sugar producer (producer's name not given).

As part of the initial investigation, a joint inspection was made by HMMP and Department of Agriculture of the Lahar Maple Ridge Farm. Five (5) bulk waste oil tanks were found at the site along with a number of steel drums. Samples of all five tanks were taken by Brian Fitzgerald and John Miller of the HMMP (results are found at Attachment IV). The waste oil was being used to fuel the sugarhouse burners which are involved in the production of maple syrup. A sample of the syrup product was also analyzed (see Attachment IV).

HAZARDOUS WASTES

The initial inspection verified the existence of five bulk storage tanks and a number of steel drums in the immediate vicinity of the sugarhouse (Attachment V). A preliminary inter-

view with Paul and David Lahar, operators of the sugarhouse, confirmed that the tanks and drums contained waste oils and waste solvents. The waste oils and solvents have been obtained from a variety of sources over the years. Two major identifiable sources of these materials have been Citizens Utilities - Newport, Vermont and Ethan Allen - Orleans, Vermont. During the preliminary interview, Paul Lahar indicated Ethan Allen - Orleans Division in the past had offered for sale waste solvents, but Mr. Lahar could not recall the exact date when this practice stopped. Mr. Lahar did say that Ethan Allen still offers for sale waste oils. Mr. Lahar was informed not to mix these solvents with any waste oil being used for fuel.

Mr. Lahar further stated that Citizens Utility offered waste transformer oil to him for use at the sugarhouse. Mr. Lahar picked up the waste transformer oil at Citizens' Newport warehouse. One of the five bulk storage tanks identified at the sugarhouse contained nearly 4,000 gallons of this waste oil.

A field test was performed on the 4,000 gallon tank allegedly containing waste transformer oil from Citizens Utilities. The test involved a preliminary determination of PCB contamination in the transformer oil (PCB is a possible constituent in transformer oil). The field test revealed no detectable concentration of PCBs. Since no apparent PCB contamination was discovered, Mr. Lahar was allowed to continue burning these oils through the remainder of the sugaring season. Subsequent sampling (results received May 16, 1985) of this transformer oil indicated that the oil contained PCBs in excess of 50 ppm (see attachment IV).

A second investigation to obtain water samples was conducted by Brian Fitzgerald and Richard Jensen. Samples from the Lahar well and adjacent spring were collected for analysis. Tests results are found in Attachment IV.

#### VIOLATIONS

The State of Vermont Hazardous waste Management Regulations ("Regulations") define waste oils as hazardous at Regulation Section 6-602(2)(a)(2) and waste solvents as hazardous at Regulation Section 6-602(2)(a)(6 and 7).

The Regulations require that persons generating greater than 100 kg per month (220 lbs) of hazardous waste comply with, at a minimum, operational standards at Regulation Section 6-609, 6-610, and 6-611. Both Ethan Allan and Citizens Utilities generate more than 100 kg of hazardous waste per month. As a result,

without a written exemption from the Secretary concerning these wastes, Citizens Utilities and Ethan Allen are in violation for improper shipping and disposal of hazardous waste. In addition, Regulation Section 6-610 requires manifesting of all hazardous waste shipment through a certified transporter. Paul Lahar does not have transporter certification.

#### CHRONOLOGY OF EVENTS

June 8, 1984	Richard Jensen discovered site.
November 8, 1984	Richard Jensen returned to site and confirmed the presence of drums and tanks.
March 15, 1985	Richard Jensen contacted the AEC Hazardous Materials Management Program.
March 19, 1985	Initial site investigation conducted by Brian Fitzgerald and John Miller, and Richard Jensen. Samples of bulk storage tanks were obtained.
April 3, 1985	Test results on maple syrup product received from Agriculture.
April 19, 1985	Meeting with Citizens Utilities to discuss the Lahar case and the Hazardous Waste Regulations in general.
April 23, 1985	Investigation conducted by Brian Fitzgerald, and Richard Jensen. Well and surface water samples were obtained.
May 8, 1985	Inspection conducted at Citizens' Newport warehouse.
May 10, 1985	Lab results received from water sampling.
May 16, 1985	Sample results received from bulk storage tanks.

#### ADDITIONAL NOTE:

In a related incident, Citizens Utilities also delivered 1,000 gallons of waste transformer oil to James Richardson, an employee of Citizens. Mr. Richardson was to use this oil as a fuel in a sugaring operation. Fortunately, Mr. Richardson has not used this oil to date and he has been instructed to tem-

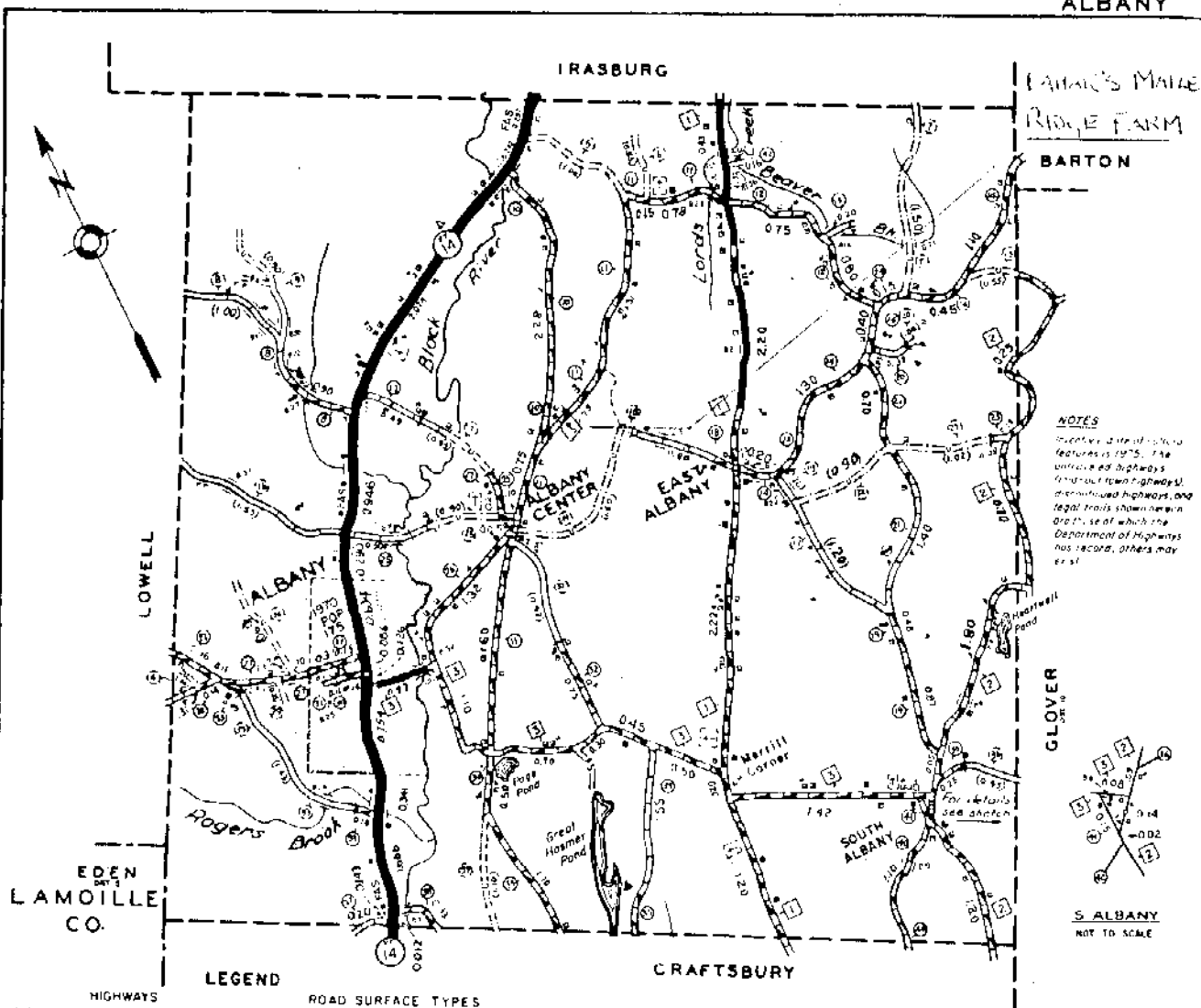
porarily store this oil at his farm. The storage will continue until the Agency drafts an enforcement action decision in the Lahar case. Currently, Citizens is having this oil tested for PCBs and other parameters. The results will be forwarded to the Agency.

In addition, a "RCRA" inspection of Citizens' warehouse in Newport was performed on May 8, 1985. The resulting trip report is found at Attachment VI.

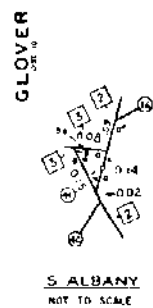
BJF:kp

ATTACHMENT I

ALBANY



**NOTES**  
 Features shown on this map are as of 1975. The unimproved highways (dashed lines) shown on this map are not shown on the Department of Highways map. If the Department of Highways has records, others may exist.



- HIGHWAYS**
- 1 DIVIDED HWY., INTERSTATE OR STATE
  - 2 INTERCHANGE NUMBER
  - 3 7-LANE STATE HIGHWAY
  - 4 END OF STATE HIGHWAY
  - 5 TOWN HIGHWAY
  - 6 U.S. NATIONAL ROUTE
  - 7 PRIVATE ROAD AND NUMBER
  - 8 DISCONTINUED HIGHWAY
  - 9 LEGAL TRAIL (HUNTER TOWN HWS)
  - 10 FOOT TRAIL
  - 11 INTERSTATE NUMBERED ROUTE
  - 12 U.S. NUMBERED ROUTE
  - 13 STATE NUMBERED ROUTE
  - 14 CLASS 1 TOWN HIGHWAY
  - 15 CLASS 2 TOWN HIGHWAY
  - 16 CLASS 3 TOWN HIGHWAY
  - 17 CLASS 4 TOWN HIGHWAY
  - 18 FCA FULLY CONTROLLED ACCESS
  - 19 FAP FEDERAL AID PRIMARY HIGHWAY
  - 20 FAS FEDERAL AID SECONDARY HIGHWAY
  - 21 FAS FEDERAL AID SECONDARY TRAIL
  - 22 NFH NATIONAL FOREST HIGHWAY
  - 23 SFH STATE FOREST HIGHWAY

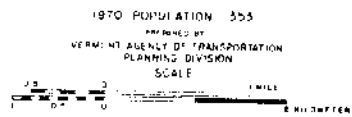
- ROAD SURFACE TYPES**
- 1 ASPHALT OR MACADAM
  - 2 ASPHALT OR MACADAM WITH CURB
  - 3 ASPHALT OR MACADAM WITH CURB AND GUTTER
  - 4 ASPHALT OR MACADAM WITH CURB AND GUTTER AND SIDEWALK
  - 5 ASPHALT OR MACADAM WITH CURB AND GUTTER AND SIDEWALK AND BIKEWAY
  - 6 ASPHALT OR MACADAM WITH CURB AND GUTTER AND SIDEWALK AND BIKEWAY AND TRAIL
  - 7 ASPHALT OR MACADAM WITH CURB AND GUTTER AND SIDEWALK AND BIKEWAY AND TRAIL AND PATH
  - 8 ASPHALT OR MACADAM WITH CURB AND GUTTER AND SIDEWALK AND BIKEWAY AND TRAIL AND PATH AND FENCE
  - 9 ASPHALT OR MACADAM WITH CURB AND GUTTER AND SIDEWALK AND BIKEWAY AND TRAIL AND PATH AND FENCE AND GATE
  - 10 ASPHALT OR MACADAM WITH CURB AND GUTTER AND SIDEWALK AND BIKEWAY AND TRAIL AND PATH AND FENCE AND GATE AND SIGN
  - 11 ASPHALT OR MACADAM WITH CURB AND GUTTER AND SIDEWALK AND BIKEWAY AND TRAIL AND PATH AND FENCE AND GATE AND SIGN AND LIGHT
  - 12 ASPHALT OR MACADAM WITH CURB AND GUTTER AND SIDEWALK AND BIKEWAY AND TRAIL AND PATH AND FENCE AND GATE AND SIGN AND LIGHT AND SOUND
  - 13 ASPHALT OR MACADAM WITH CURB AND GUTTER AND SIDEWALK AND BIKEWAY AND TRAIL AND PATH AND FENCE AND GATE AND SIGN AND LIGHT AND SOUND AND TASTE
  - 14 ASPHALT OR MACADAM WITH CURB AND GUTTER AND SIDEWALK AND BIKEWAY AND TRAIL AND PATH AND FENCE AND GATE AND SIGN AND LIGHT AND SOUND AND TASTE AND SMELL
  - 15 ASPHALT OR MACADAM WITH CURB AND GUTTER AND SIDEWALK AND BIKEWAY AND TRAIL AND PATH AND FENCE AND GATE AND SIGN AND LIGHT AND SOUND AND TASTE AND SMELL AND FEEL
  - 16 ASPHALT OR MACADAM WITH CURB AND GUTTER AND SIDEWALK AND BIKEWAY AND TRAIL AND PATH AND FENCE AND GATE AND SIGN AND LIGHT AND SOUND AND TASTE AND SMELL AND FEEL AND LOOK
  - 17 ASPHALT OR MACADAM WITH CURB AND GUTTER AND SIDEWALK AND BIKEWAY AND TRAIL AND PATH AND FENCE AND GATE AND SIGN AND LIGHT AND SOUND AND TASTE AND SMELL AND FEEL AND LOOK AND TOUCH
  - 18 ASPHALT OR MACADAM WITH CURB AND GUTTER AND SIDEWALK AND BIKEWAY AND TRAIL AND PATH AND FENCE AND GATE AND SIGN AND LIGHT AND SOUND AND TASTE AND SMELL AND FEEL AND LOOK AND TOUCH AND HEAR
  - 19 ASPHALT OR MACADAM WITH CURB AND GUTTER AND SIDEWALK AND BIKEWAY AND TRAIL AND PATH AND FENCE AND GATE AND SIGN AND LIGHT AND SOUND AND TASTE AND SMELL AND FEEL AND LOOK AND TOUCH AND HEAR AND SMELL
  - 20 ASPHALT OR MACADAM WITH CURB AND GUTTER AND SIDEWALK AND BIKEWAY AND TRAIL AND PATH AND FENCE AND GATE AND SIGN AND LIGHT AND SOUND AND TASTE AND SMELL AND FEEL AND LOOK AND TOUCH AND HEAR AND SMELL AND TASTE
  - 21 ASPHALT OR MACADAM WITH CURB AND GUTTER AND SIDEWALK AND BIKEWAY AND TRAIL AND PATH AND FENCE AND GATE AND SIGN AND LIGHT AND SOUND AND TASTE AND SMELL AND FEEL AND LOOK AND TOUCH AND HEAR AND SMELL AND TASTE AND FEEL
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- BRIDGES**
- 1 BRIDGE (OVER 100 FEET OR MORE)
  - 2 BRIDGE (OVER 20 FEET)
  - 3 BRIDGE (OVER 10 FEET)
  - 4 BRIDGE (OVER 5 FEET)
  - 5 BRIDGE (OVER 2 FEET)
  - 6 BRIDGE (OVER 1 FEET)
  - 7 BRIDGE (OVER 6 INCHES)
  - 8 BRIDGE (OVER 3 INCHES)
  - 9 BRIDGE (OVER 1 INCH)
  - 10 BRIDGE (OVER 1/2 INCH)
  - 11 BRIDGE (OVER 1/4 INCH)
  - 12 BRIDGE (OVER 1/8 INCH)
  - 13 BRIDGE (OVER 1/16 INCH)
  - 14 BRIDGE (OVER 1/32 INCH)
  - 15 BRIDGE (OVER 1/64 INCH)
  - 16 BRIDGE (OVER 1/128 INCH)
  - 17 BRIDGE (OVER 1/256 INCH)
  - 18 BRIDGE (OVER 1/512 INCH)
  - 19 BRIDGE (OVER 1/1024 INCH)
  - 20 BRIDGE (OVER 1/2048 INCH)
  - 21 BRIDGE (OVER 1/4096 INCH)
  - 22 BRIDGE (OVER 1/8192 INCH)
  - 23 BRIDGE (OVER 1/16384 INCH)
  - 24 BRIDGE (OVER 1/32768 INCH)
  - 25 BRIDGE (OVER 1/65536 INCH)
  - 26 BRIDGE (OVER 1/131072 INCH)
  - 27 BRIDGE (OVER 1/262144 INCH)
  - 28 BRIDGE (OVER 1/524288 INCH)
  - 29 BRIDGE (OVER 1/1048576 INCH)
  - 30 BRIDGE (OVER 1/2097152 INCH)

- MISCELLANEOUS**
- 1 RAILROAD
  - 2 RAILROAD CROSSING
  - 3 RAILROAD CROSSING WITH SIGNAL
  - 4 RAILROAD CROSSING WITH SIGNAL AND GATE
  - 5 RAILROAD CROSSING WITH SIGNAL AND GATE AND LIGHT
  - 6 RAILROAD CROSSING WITH SIGNAL AND GATE AND LIGHT AND SOUND
  - 7 RAILROAD CROSSING WITH SIGNAL AND GATE AND LIGHT AND SOUND AND TASTE
  - 8 RAILROAD CROSSING WITH SIGNAL AND GATE AND LIGHT AND SOUND AND TASTE AND SMELL
  - 9 RAILROAD CROSSING WITH SIGNAL AND GATE AND LIGHT AND SOUND AND TASTE AND SMELL AND FEEL
  - 10 RAILROAD CROSSING WITH SIGNAL AND GATE AND LIGHT AND SOUND AND TASTE AND SMELL AND FEEL AND LOOK
  - 11 RAILROAD CROSSING WITH SIGNAL AND GATE AND LIGHT AND SOUND AND TASTE AND SMELL AND FEEL AND LOOK AND TOUCH
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- CULTURAL FEATURES**
- 1 FARM
  - 2 FARM BUILDING
  - 3 FARM BUILDING (OTHER THAN FARM)
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GENERAL HIGHWAY MAP  
TOWN OF ALBANY



**MILEAGE SUMMARY**

CLASS 1 TOWN HIGHWAYS	0.000
CLASS 2 TOWN HIGHWAYS	
NO 1	8.37
NO 2	4.44
NO 3	3.03
TOTAL CLASS 2 TOWN HWY	16.04
CLASS 3 TOWN HIGHWAYS	
TOTAL TOWN HWYS	29.27
STATE HIGHWAYS	
STATE HWY 67 IN	8.722
STATE HWY	
TOTAL STATE HWYS	8.722
TOTAL TRAVELED HWYS, FEB. 1, 1970	56.772

\* EXCLUDES CLASS 4 MILEAGE

ATTACHMENT II

CASE # 027-815

# HAZARDOUS MATERIALS INCIDENT REPORT

CASE ASSIGNED TO: Terry H. Hester

Time: \_\_\_\_\_ Date: 12/15/81

Caller's Name/Organization: W. H. Hester, Jr., 2431 / 6145

Call Back Number: \_\_\_\_\_

CHEMTREC: Called ☐ to be called by: Local ☐ State ☐ Not Needed ☒

PROBLEM: Type of Accident: Spill - 100 lbs. of 100% H<sub>2</sub>SO<sub>4</sub> in 100 lb. drum

Time of Accident: 10:00 AM - 10:15 AM

LOCATION: Town/City: W. H. Hester, Jr., 2431 / 6145

Highway/Road/Other: \_\_\_\_\_

Mile Marker/Other Locator: \_\_\_\_\_

DETAILS: Injuries/Fatalities/Observed Ill Effects: \_\_\_\_\_

Weather: \_\_\_\_\_ Populated/Open Area: \_\_\_\_\_

On-Scene Status: \_\_\_\_\_

PRODUCT(S) INVOLVED (Spell It Out): \_\_\_\_\_ Chemical Name(s): \_\_\_\_\_

Trade Name(s): \_\_\_\_\_

Characteristics of material (Vapor, Liquid, Solid - Other Observations): \_\_\_\_\_

Quantity: \_\_\_\_\_ Type of Container: \_\_\_\_\_

☐ Single Load

☐ Mixed Load

CARRIER/FACILITY: \_\_\_\_\_

Railroad Car No.: \_\_\_\_\_ Truck/Trailer No.: \_\_\_\_\_

Origin/Shipper: \_\_\_\_\_

Destination/Consignee: \_\_\_\_\_

Bill-Lading/Waybill No.: \_\_\_\_\_

SUMMARY OF ACTION TAKEN 200 lbs. of 100% H<sub>2</sub>SO<sub>4</sub> in 100 lb. drum

3-18 VICTIMS SUE WITH DICK JENSEN TAKEN TO PINK AND DAVID KIRBY - TALK 24

CONNECTIONS W/ MADE WITH CASE # 027-815 147 2-1



ATTACHMENT III

CASE # 1118-B4

# HAZARDOUS MATERIALS INCIDENT REPORT

CASE ASSIGNED TO: JOHN MILLER

Time: \_\_\_\_\_ Date: 21 DEC 1984

Caller's Name/Organization: PETER ROMANOS (INDIVIDUAL THIRD PARTY)

Call Back Number: 755-6184

CHEMTREC: Called ☐ to be called by: Local ☐ State ☐ Not Needed ☒

PROBLEM: Type of Accident: IMPROPER WASTE DISPOSAL BY CITIZEN UTILITIES

Time of Accident: CONTINUING FROM THE - NAPI SYRVE PROJECT

LOCATION: Town/City: NEWPORT

Highway/Road/Other: \_\_\_\_\_

Mile Marker/Other Locator: \_\_\_\_\_

DETAILS: Injuries/Fatalities/Observed Ill Effects: \_\_\_\_\_

Weather: \_\_\_\_\_ Populated/Open Area: \_\_\_\_\_

On-Scene Status: \_\_\_\_\_

PRODUCT(S) INVOLVED (Spell It Out): Chemical Name(s): TRANSFORMER OIL

Trade Name(s): \_\_\_\_\_

Characteristics of material (Vapor, Liquid, Solid - Other Observations): \_\_\_\_\_

Quantity: \_\_\_\_\_ Type of Container: \_\_\_\_\_

☐ Single Load

☐ Mixed Load

CARRIER/FACILITY: \_\_\_\_\_

Railroad Car No.: \_\_\_\_\_ Truck/Trailer No.: \_\_\_\_\_

Origin/Shipper: \_\_\_\_\_

Destination/Consignee: \_\_\_\_\_

Bill-Lading/Waybill No.: \_\_\_\_\_

SUMMARY OF ACTION TAKEN ADDED FROM BARRETT (DISC 1118) ON 12/21/84

WAS NOT ADVISED BY THE FORMER TO CITIZEN UTILITIES

③ March 1 BCS followup at no reply by Citizens. Taken w Steven Bliss - Sent New Form

MARCH 14 - SITE INVESTIGATION AT CITIZEN'S PARK - BCS LITERS COLLECTED FROM A 1  
TRANSFORMER OIL FROM CITIZEN

MARCH 27 - CITIZEN'S COUNCIL REPORTING INCIDENTS CONCERNING THE OIL OIL

ATTACHMENT IV

75 GREEN MOUNTAIN DRIVE, SOUTH BURLINGTON, VERMONT 05401, TELEPHONE (802) 658-1074

May 14, 1985

Mr. Harold Garabedian  
State of Vermont, AEC  
Division of Air & Solid Waste  
State Office Building  
Montpelier, VT 05602

Dear Mr. Garabedian:

Aquatec Project No. 84129, ETR No. 4748

On March 22, 1985, Brian Fitzgerald, of your division, delivered four oil samples, collected on March 19, 1985 at Lahar's Maple Ridge Farm in Albany, VT, for analysis. Sample descriptions and assigned Aquatec lab numbers are as follows:

Aquatec Lab No. 45307.	Sample from a 4,000 gallon tank. Lab I.D. No. A010, sample tag No. 00308.
Aquatec Lab No. 45308.	Sample from a 3,000 gallon tank. Lab I.D. No. A011, sample tag No. 00309.
Aquatec Lab No. 45309.	Sample from a 3,000 gallon tank. Lab I.D. No. A013 on tag but No. A012 on bottle, sample tag No. 00310.
Aquatec Lab No. 45310.	Sample from a 3,000 gallon tank. Lab I.D. No. A013, sample tag No. 00311.
Aquatec Lab No. 45311.	Sample from a 1,000 gallon tank. Lab I.D. No. A014, sample tag No. 00795.

The results of the analysis in mg/Kg are summarized below.

	<u>Aquatec Lab No.</u>				
	<u>45307</u>	<u>45308</u>	<u>45309</u>	<u>45310</u>	<u>45311</u>
Total Halogen	914	483	867	666	783
Inorganic Halogen	<0.5	<0.5	<0.5	<0.5	<0.5
PCB's (total PCB's)	55	--	--	--	<1
PCB's (Aroclor 1260)	--	1.1	4.0	43	--
Lead	6.4	1680	1200	260	310
Cadmium	<0.4	3.5	2.7	1.7	2.3
Chromium	0.6	5.5	4.6	1.4	21

Mr. Harold Garabedian  
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May 14, 1985

The PCB concentrations found did not account for the organic halogen concentrations observed (total halogen less inorganic halogen), so a qualitative GC/MS scan for volatile organic compounds was performed to identify other organohalogen compounds present. All five samples were found to contain methylene chloride, 1,1,1-trichloroethane, and trichloroethene. Of these three, the methylene chloride was present in the greatest concentration in all five of the oil samples.

Sincerely,

R. M. Moore, M.D.

R. Mason McNeer  
Assistant Laboratory Director

RMA1/dmb

SAMPLE NO:



85 APR 3 1985

STATE OF VERMONT  
DEPARTMENT OF AGRICULTURE  
116 STATE STREET, STATE OFFICE BUILDING  
MONTPELIER, VERMONT 05602

NAME: Lahar's Maple Ridge Farm DATE COLLECTED: 3-20-85  
ADDRESS: RFD DATE ANALYZED: 3-25-85  
Irasburg, VT 05845

ACTIVE INGREDIENT	ANALYTICAL METHOD	DETECTED
	Method: GLC(ECD); column 3% OV-1, oven 190°C, det 375°C, inj 250°C, flow 45ml/min.	
	Extraction: 10g Maple syrup extracted with 10ml Hexane. Mixture was shaken for 10 mins. Hexane layer was removed and concentrated down to 1ml.	
aroclor		
1242	Maple syrup 1/2 pint Fancy Grade	ND
1254	Maple syrup 1/2 pint Fancy Grade	ND
1260	Maple syrup 1/2 pint Fancy Grade	ND
	Limit if detection: 10 ppb	
	Spike Recovery Performed	

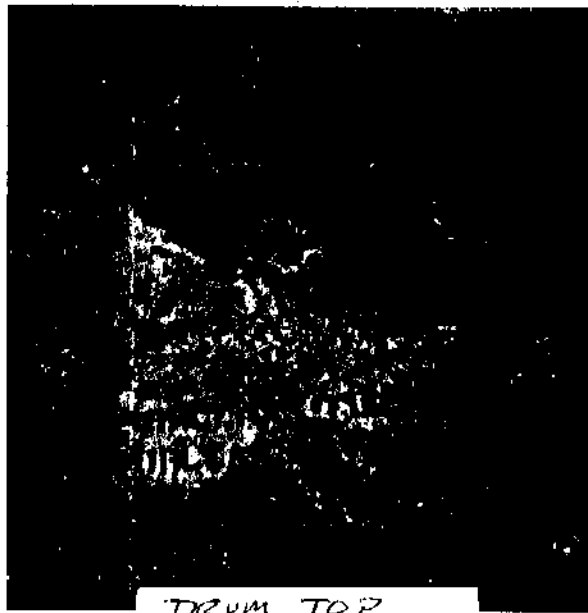
DESCRIPTION OF SAMPLE(S):

REMARKS:

ND-not detected

*John Jaworski*  
John Jaworski

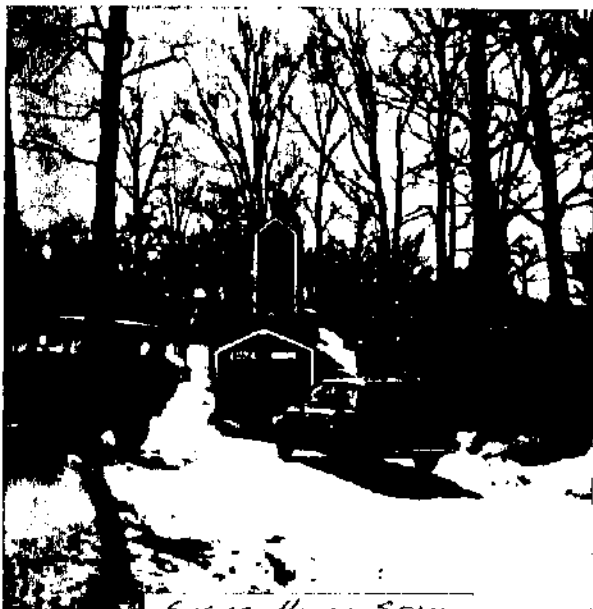
ATTACHMENT V



DRUM TOP  
LAHAR'S FARM  
3-19-85

#27

JCH



SUGAR HOUSE STARK  
BURHAR'S OPERATING  
LAHAR'S FARM  
3-19-85

#27

JCH



SUGAR HOUSE STARK  
BURHAR'S OPERATING  
LAHAR'S FARM  
3-19-85

#27

JCH





BARRELS OF OILS  
AND SOLVENTS  
LAHAR'S FARM  
3-17-85

#27 JCH



BARRELS OF OILS  
AND SOLVENTS  
LAHAR'S FARM  
3-17-85

#27 JCH



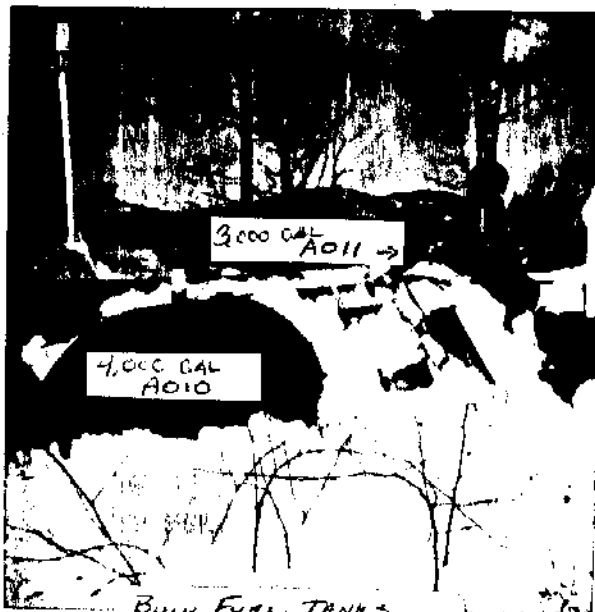
BARRELS OF OILS  
AND SOLVENTS  
LAHAR'S FARM  
3-17-85

#27 JCH



BARRELS OF OILS  
& SOLVENTS  
LAHAR'S FARM  
3-17-85

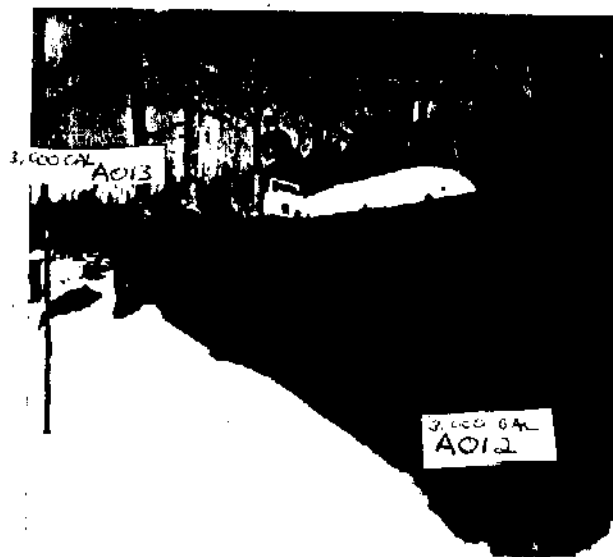
#27 JCH



BULK FUEL TANKS  
LAHAR'S FARM  
ALBANY VT  
3-19-85

#27

JCH



BULK FUEL TANKS  
LAHAR'S FARM  
ALBANY VT  
3-19-85

#27

JCH



BULK FUEL TANKS  
LAHAR'S FARM  
3-19-85

#27

JCH



BULK FUEL TANKS  
LAHAR'S FARM  
ALBANY VT  
3-19-85

#27

JCH

## TRIP REPORT

CITIZENS UTILITIES  
P. O. Box 604  
27 Main Street  
Newport, VT 05855

CORPORATE HEADQUARTERS:

Citizens Utilities  
High Ridge Park  
Stamford, CT 06905

(203) 329-8800

SITE LOCATION:

Pine Hill  
Derby, Vermont

PARTICIPANTS:

Steven Bliss, Citizens  
David Keefe, Citizens  
Brian Fitzgerald, VT AEC

DATE:

May 8, 1984

RECENT INSPECTION:

NONE

PURPOSE OF INSPECTION:

Determine status  
Determine compliance

PERMITS:

NONE

EPA ID NO:

NONE

SOURCE CLASSIFICATION:

State Generator  
(>100 kg/month)

CASE HISTORY:

Citizens Utilities had never notified the HMMP program of hazardous waste activity. Apparently, they never considered waste oils a hazardous waste. However, on two separate occasions Citizens had applied for a provisional identification number to enable them to manifest waste material through a certified transporter. On July 2, 1984, a request for a provisional ID number was received (VTP000001020) from Dave Keefe, Citizens, for the disposal of waste capacitors and contaminated soil recovered from a spill. On September 19, 1984, a second request for a provisional ID number (VTP000001038) was received from Steve Bliss, Citizens, for the transport of PCB contaminated trans-

former oil through Transformers Services. This shipment was never manifested. Mr. Bliss informed the AEC that the work was never completed.

On December 21, 1984, the Agency was notified of improper disposal by Citizens of waste transformer oils to a maple syrup producer. The maple syrup producer was not identified at the time. Subsequent investigations have verified the maple syrup producer accepting waste transformer oil (Paul Lahar, Albany, VT.).

Citizens informed the Agency that since April, 1979, Citizens had disposed of approximately 10,000 gallons of various oils through Paul Lahar. In May, 1984, Citizens also disposed of 1,000 gallons of transformer oil through Jim Richardson, an employee, for use in maple syrup production.

The March 19, 1985, interview and inspection at the Lahar farm in Albany confirmed the disposal of waste oils through Mr. Lahar.

#### PROCESS DESCRIPTION:

Citizens is a private electrical utility operating in the northern section of Vermont. As part of their service equipment, Citizens Utilities numerous transformers of various sizes, capacitors, and other units which contain di-electric oils. These oils need to be changed periodically. Many of the older oils contain PCBs. In addition, maintenance operations of service vehicles generate waste oils and solvents. Citizens has never managed these waste streams in compliance with State Regulations.

#### INSPECTION NOTES:

Citizens' warehouse on Pine Hill, Derby, Vermont, contains old transformers and capacitors with various amounts of oils. In the past, the procedure for handling this oil was to drain the transformers, remove the oils, and offer for resale. Mr. Bliss was informed that in the future, once a transformer was no longer salvageable, the oils are to be drained, stored, and disposed in accordance with the Hazardous Waste Regulations. Also, waste crankcase and hydraulic oils and solvents were to be stored and disposed in accordance with the Regulations.

#### VIOLATIONS:

Citizens Utilities' Derby Warehouse was found to be in

violation of the following operational requirements:

Regulation Section 6-609(2)(b): Container used for storage shall be approved by Vermont AOT and packaged according to Transportation requirements. Citizens currently allows waste transformer oils to remain in the transformers in storage.

Regulation Section 6-609(2)(c): Containers shall be properly marked and labeled. Containers used for storage at Citizens were not properly marked and labeled.

Regulation Section 6-6-0(2)(d): An inventory log shall be maintained at the facility. Citizens had no such log.

Regulation Section 6-609(2)(e): An inspection program shall be implemented at each facility. Citizens had no such inspection schedule.

Regulation Section 6-609(2)(g): A contingency and training plan shall be developed for each facility. Citizens had not developed such plans.

Citizens has formally notified the Agency of its activity, submitted an annual report for hazardous waste generation in the calendar year 1984, and applied for a permanent EPA ID number as requested by the Agency

**ACTION TAKEN:**

A Notice of Violation will be issued for the operational violations previously outlined. An investigative report concerning the improper disposal methods used by Citizens will be submitted to the Commissioner for an enforcement decision.

BJF:kp